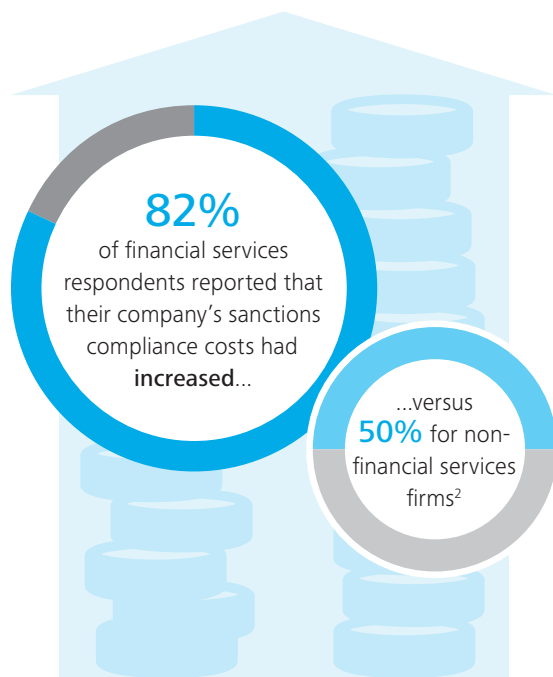


Managing sanctions compliance is complex. Are you up to the challenge?

Deloitte conducted a survey¹ to better understand how businesses are managing the challenges of sanctions compliance, the impact of new laws and recent enforcement actions on organizations, and opportunities for improving sanctions compliance efforts.

The cost of compliance is rising, especially for financial services



Why have costs increased? Top 3 reasons:



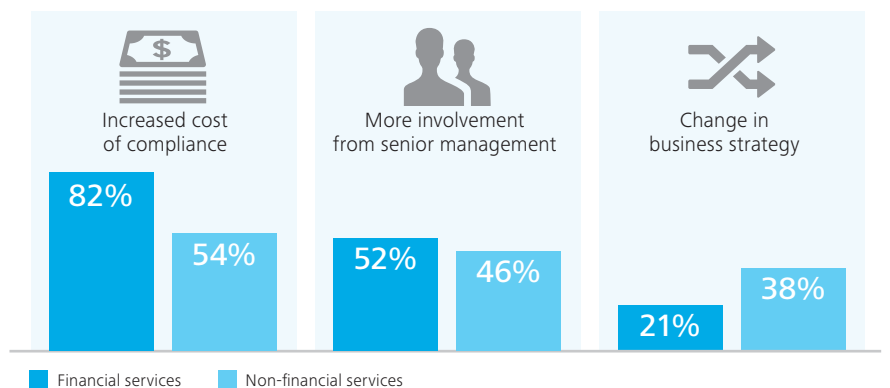
Learn from those that have conducted investigations

Companies that conducted a sanctions-related investigation were twice as likely to incur increased costs. They were also more likely to train additional personnel and expected that senior management would become more involved in the coming years.



Expected impacts over next three years from sanctions requirements

Financial services executives were much more likely to expect increased compliance costs than were those from other industries (**82% vs. 54%**).



¹ Deloitte conducted a survey to assess how companies are managing sanctions compliance and the challenges they face. The online survey was completed by 107 executives from February 11 to March 23, 2015. Respondents represented a variety of industries, with over half coming from Financial Services companies. Note: some percentages in the charts throughout this report may not add up to 100 percent due to rounding or to reflect questions where survey participants had the option to choose multiple responses.

² In the last three years.

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Here are some important items to consider when evaluating your sanctions program:



Focus on monitoring changes to sanctions programs and recognize they are becoming more complex

According to our survey results, most companies (75%) assess and update their sanctions compliance programs annually or more often. Nevertheless, keeping up with changes to OFAC sanctions programs and sanctions against specific industry sectors were most frequently cited as concerns by all senior executives.



Don't underestimate the importance of good quality data

When asked what their most difficult challenge is regarding sanctions compliance, executives most often cited data quality (35%) and screening customers and transactions (28%). Implementing procedures for obtaining and verifying customer information as well as investing in a strong customer due diligence program are practical steps companies can take to obtain quality data.



Make sure you have the proper resources in place and plan for future demands

Three-quarters or more of survey respondents indicated that their company provides sanctions training to compliance personnel, to front-line personnel, and to senior management. Only about half of respondents indicated that board members receive training. Companies should not wait for a sanctions-related investigation to invest in its sanctions program, especially training.



Opportunities do exist, be sure to capitalize!

44% of respondents said their company is very or somewhat likely to undergo Cuban market planning. These findings suggest that at a time when compliance costs are increasing, there may be opportunities for companies by expanding services into countries where sanctions have been eased.

Increasing complexity in regulations, rising costs of compliance, and an increasing number of investigations—these are just some of the ways sanctions are impacting organizations. Don't wait to evaluate and invest in your programs. **The time is now.**



[Learn more](#)

For more information or additional survey findings, please visit www.deloitte.com/us/sanctions-survey

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